

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2008-192-WS

In Re:

**Petition of the Office of Regulatory Staff)
For a Declaratory Order Against Seahorse)
Investment and/or Britt Gaston Requiring)
Certification as a Water and Sewer Utility)
And the Posting of a Performance Bond)**

**EXPLANATORY BRIEF AND JOINT
MOTION FOR ADOPTION OF
SETTLEMENT AGREEMENT**

Pursuant to 26 S.C. Code Ann. Regs. 103-829, the Settlement Policies and Procedures of the Public Service Commission of South Carolina (“the Commission”), revised June 13, 2006, and other applicable statutes, rules and regulations, Seahorse Investment and/or Britt Gaston (“the Company”) and the Office of Regulatory Staff (“ORS”) (collectively referred to as the “Parties” or sometimes individually as “Party”) hereby file this Explanatory Brief and Joint Motion requesting approval of the settlement agreement filed herewith. In support of this Joint Motion, the Parties state as follows:

1. On May 8, 2008, ORS filed a petition for a declaratory order against the Company requiring certification as a water and sewer utility and the posting of a performance bond.
2. The Parties conducted settlement negotiations via conference call on numerous occasions during June and July of 2008.
3. After such negotiations, the Parties reached agreement and request that the Commission approve the settlement agreement without the requirement for a hearing.

4. Additionally, the Company requests approval of the transfer of the system from Bartlett Real Estate, Inc. to the Company. The Company requests the Commission also approve the transfer without the requirement for a hearing. ORS does not object to this request.

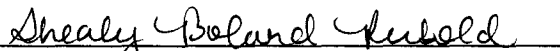
5. This transfer approval request is made in conjunction with the Settlement Agreement. In the event the Settlement Agreement is not approved in its entirety by the Commission, the Company reserves the right to withdraw this request and file a separate transfer approval request in conjunction with a case to establish rates.

WHEREFORE, having fully set forth their Explanatory Brief and Joint Motion, the Parties and ORS request that the Commission approve the Settlement Agreement and the corresponding transfer without a hearing.

[SIGNATURES ON FOLLOWING PAGE}

WE SO MOVE:

Representing the Office of Regulatory Staff


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WE SO MOVE:

Representing Seahorse Investment, LLC and Britt Gaston

A handwritten signature in black ink, appearing to read "Lea B. Kerrison", written over a horizontal line.

Lea B. Kerrison, Esquire

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